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April 6, 2023

VIA ECF

The Honorable Denise L. Cote
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Granted.
Denise Cote
4/7/23

Re: *United States v. Tejada Cervantes*, 22 CR 566 (DLC)

Dear Judge Cote:

I was assigned to represent the defendant, Saul Ivan Tejada Cervantes, during a conference today pursuant to the provisions of the Criminal Justice Act ("CJA"), 18 U.S.C. § 3006A. For the following reasons, it is respectfully requested that the Court authorize the assignment of Ms. Sarah Speis as an associate attorney to assist in this case.

Mr. Tejada Cervantes is charged with Narcotics Distribution, in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A). Trial is currently scheduled for June 12, 2023, with motions due April 28, 2023. As a result of the impending trial date and counsel's recent appointment to the case, the assignment of Ms. Speis as an associate attorney will allow her to assist counsel in reviewing the discovery and meeting with Mr. Tejada Cervantes to discuss and review the materials. Additionally, Ms. Speis will assist counsel in the preparation of and during trial. As a member of the CJA Panel, I am highly conscious of the need to avoid expending CJA funds unnecessarily. Due to the amount of discovery that needs to be reviewed prior to the submission of motions and the trial date, it will be cost efficient to have an associate attorney review and organize the materials at a significantly reduced rate.

Ms. Speis is an attorney admitted to the New York State Bar and both the Southern and Eastern Districts of New York. Since October of 2017, Ms. Speis has worked as an associate attorney in my office and has assisted me, and other CJA attorneys by reviewing discovery, conducting legal research, and drafting sentencing memoranda in many CJA cases in the Southern and Eastern Districts, including: *United States v. Manuel Tejada*, 17 Cr. 99 (KMK); *United States v. David Cabell*, 15 Cr. 791 (NSR); *United States v. Ronny Capellan*, 17 Cr. 247 (RRM); *United*

States v. Robert Kolaczynski, 16 Cr. 834 (NSR); *United States v. Leamax Neunie*, 10 Cr. 809 (KAM); *United States v. Ashanti Sease-Matthews*, 16 Cr. 326 (ARR); among others, and is currently assigned as a paralegal in *United States v. Rick Dane Jr.*, 20 Cr. 160 (MKV), and as an associate attorney in *United States v. Narzullaeva*, 20 Cr. 681 (JPC); *United States v. White*, 21 Cr. 660 (ER); and *United States v. Williams*, 22 Cr. 452 (CS) Ms. Speis has also assisted CJA attorneys in trials in both the Southern and Eastern Districts of New York, including: *United States v. Piquant*, 18 Cr. 723 (PGG), *United States v. Tapia*, 17 Cr. 512 (KMW) and *United States v. Mensah*, 19 Cr. 60 (SJ), and assisted me in a trial in the Eastern District of Pennsylvania, *United States v. Feliciano-Trinidad*, 19 Cr. 152 (JS).

Given counsel's recent appointment and the trial date, I believe it is necessary to have an associate attorney assigned to assist counsel in preparation of and during trial in this case. Accordingly, it is respectfully requested that Ms. Sarah Speis be assigned as an associate attorney in this matter, and that Ms. Speis be permitted to bill at a rate of \$95.00 per hour, for an estimated 100 hours. The Court's time and attention to this matter is greatly appreciated.

Respectfully submitted,

/s/

John A. Diaz, Esq.